



Exelon Generation®

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October 18, 2013

Ms. Cindy Bladey, Chief
Rules, Announcements, and Directives Branch (RADB)
Office of Administration
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Comments Concerning Draft Interim Staff Guidance (ISG) JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions" (78FR57418, dated September 18, 2013, Docket ID NRC-2013-0215)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments published in the *Federal Register* on September 18, 2013 (i.e., 78FR57418) concerning draft Interim Staff Guidance (ISG) JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions."

The NRC is providing this draft ISG to assist nuclear power reactor licensees with the identification of methods needed to comply with requirements to mitigate challenges to key safety functions. These requirements are contained in NRC Order EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Performing under Severe Accident Conditions." This ISG is applicable to all operating Boiling-Water Reactor (BWR) licensees with Mark I and Mark II containments. This ISG endorses, with exceptions and clarifications, the methodologies described in the Nuclear Energy Institute (NEI) guidance document NEI 13-02, "Industry Guidance for Compliance with Order EA-13-109," Revision C2.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft ISG. Exelon supports the comments submitted by NEI on behalf of the industry related to this subject.

Respectfully,

David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

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